

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

PATRICIA KEECH and DAVID NEWFIELD, )	)	
on behalf of themselves and all others similarly )	)	
situated, )	)	
	)	
Plaintiffs, )	)	Case No.: 18-cv-00683-JRT-HB
	)	
vs. )	)	
	)	
SANIMAX USA, LLC, )	)	<b>CLASS ACTION</b>
	)	
Defendant. )	)	

**DECLARATION OF JEFFREY S. STORMS**

I, Jeffrey S. Storms, solemnly affirm as follows:

1. I am over 18 years old and I am one of Plaintiffs’ attorneys in the above-captioned matter.
2. I make this Declaration in support of Plaintiffs’ Motion to Preliminarily Approve Class Action Settlement.
3. Attached hereto as Exhibit 1 is a true and correct copy of an August 6, 2019 Settlement Agreement, which contains Exhibits A through H attached thereto.
4. The Exhibits to Exhibit 1 are as follows:
  - a. Exhibit A – First Amended Complaint
  - b. Exhibit B – Class Area Map
  - c. Exhibit C – List of Resident Data Sheet Respondents
  - d. Exhibit D – Class Notice
  - e. Exhibit E – Claim Form

- f. Exhibit F – [proposed] Preliminary Approval Order
- g. Exhibit G – [proposed] Order and Final Judgment
- h. Exhibit H – Destruction Certificate

5. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that everything stated in this document is true and correct and that this Declaration was executed on August 9, 2019 in Hennepin County, Minnesota.

**FURTHER YOUR DECLARANT SAYETH NOT.**

/s/ Jeffrey S. Storms  
Jeffrey S. Storms, #0387240